

BellSouth Telecommunications, Inc. 615 214-6301  
Suite 2101 Fax 615 214-7406  
333 Commerce Street  
Nashville, Tennessee 37201-3300

March 13, 1997

**BELLSOUTH**  
REGULATORY AUTH.  
'98 MAR 13 AM 11 47  
Guy M. Hicks  
General Counsel  
OFFICE OF THE  
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance  
(InterLATA) Service in Tennessee Pursuant to Section 271 of the  
Telecommunications Act of 1996*  
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the responses of BellSouth Telecommunications, Inc. to the data requests of ACSI. A copy has been provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

Enclosure

**REQUEST:** Please explain the steps followed by BellSouth systems when a CLEC places a resale order which moves a BellSouth customer entirely off of BellSouth service and onto ACSI service.

**RESPONSE:** Assuming ACSI is requesting information on a non-complex resale order, the following is a description of the steps taken by BellSouth's systems.

First the order is placed by the CLEC into EDI or LENS. The order then flows to the Local Exchange Ordering ("LEO") database. If the order is correct, then it flows to the LESOG database. If the order is correct, then it flows to the SOCS database. If the order is correct, SOCS then sends a firm order confirmation (FOC) to LEO, which in turn sends the FOC to EDI. LEO sends the FOC via the EDI or LENS interface to the CLEC. SOCS then sends the order to the same internal provisioning, maintenance and repair, and billing databases that are used by BellSouth for its retail orders. When the order is complete, confirmation is sent to SOCS, which in turn sends a confirmation notice (CN) to LEO. LEO sends the CN via the EDI or LENS interface to the CLEC.

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Dated March 6, 1998  
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**REQUEST:** Explain which BellSouth employees have access to the databases that reflect the fact that a customer has switched to a CLEC.

**RESPONSE:** The BellSouth employees who have access to the databases that reflect the fact that a customer has switched to a CLEC are the LEO database administrators and the CRIS databases administrators.

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**REQUEST:** ACSI often orders a Customer Service Record ("CSR"), only to find out that the customer has additional services on a second CSR. What single data point can ACSI provide to BellSouth to ensure that it receives a complete CSR?

**RESPONSE:** CSRs are requested via a customer's billing number. ACSI is responsible for obtaining this information from its customers. If the customer -- for example, a business -- has more than one location, it will have a different number for each location.

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REQUEST: How does ACSI know whether a customer has special pricing unless pricing is included in the CSR?

RESPONSE: BellSouth's pricing information is available to ACSI, and all other CLECs via a number of different channels (e.g., tariffs, price lists, advanced CLEC notification of all tariff filings and promotions, the internet, and advertising.) Moreover, whether or not a specific customer has "special retail pricing" is irrelevant to ACSI's ability to order, provision maintain or bill for services. Neither the Telecommunications Act nor the FCC's Interconnection Order require Incumbent Local Exchange Companies to provide such information at the customer specific level, as ACSI's Data Request suggests.

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REQUEST: ACSI receives resold service from BellSouth at a discount off the end user's price. The price to the end user multiplied by the Tennessee discount produces part of ACSI's "cost" in granting service to the end user. How can a CLEC determine its costs absent the pricing information on the CSR?

RESPONSE: BellSouth's **customer specific retail** rate information has no bearing on ACSI's cost structure. ACSI can determine its operating costs through calculations using the avoided discount and TELRIC pricing methodology. As stated in Request No. 4, BellSouth's retail rate information is available via many different channels. Moreover, such information is not needed for ACSI to order, provision, maintain or bill for resold services or unbundled network elements provided by BellSouth.

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**REQUEST:** Please list by date all audits performed by BellSouth of the Local Carrier Service Center ("LCSC") and other systems supporting CLECs.

**RESPONSE:** See BellSouth's response to AT&T's First Data Request, Item 24.

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**REQUEST:** Please describe the process by which BellSouth notifies CLECs of resale customers returning to BellSouth, due date jeopardies, and the date on which a resale customer becomes an ACSI customer.

**RESPONSE:** When a CLEC customer requests to return to BellSouth, and the order is issued, BellSouth places a disconnect reason on the order. Once the order has completed (with "CPX," or completion status), an information file is sent via NDM (Network Data Mover) to an outside supplier. The data is transmitted every evening between 8:00 p.m. and 12:00 midnight. Within 24 hours of receiving this information file, the outside supplier sends a letter to the billing name and address as listed on the particular account. The letter is sent via First Class U. S. Mail. (Attachment 1 is a copy of the letter.)

The aforementioned process has been audited to ensure that these notices have been received by the outside supplier and that the letters have been generated and placed in U. S. Mail. The process is the same in the case of a CLEC customer requesting a move to another CLEC.

Regarding due date jeopardies, please see the Affidavit of William N. Stacy. Once an order is pending in the Service Order Control System (SOCS), certain situations can arise that result in a "jeopardy" condition. A jeopardy occurs when it appears that the previously established due date for the order may not or will not be met. Jeopardy notifications, often called "jeopardies," therefore advise CLECs when an order is not expected to be completed by the due date.

There are two types of jeopardies. The first type, "customer-caused" or "end user-caused" jeopardies, occurs when the end user customer misses a scheduled installation appointment. The second type, "company-caused" or "service jeopardies", can occur for many reasons. Some examples include the lack of available facilities for a particular customer's location, or unforeseen circumstances affecting technicians' workload in an area.



There currently is no national standard for electronic notification of either end user-caused or company-caused jeopardies. However, for end user-caused jeopardies, BellSouth transmits electronic notifications to CLECs via the EDI interface to alert the CLEC that a new due date is needed. Despite the lack of a national standard, BellSouth was able to create a process to transmit this information via EDI because there is a single reason for this type of jeopardy, and the notification therefore could readily be mechanized in advance of a standard. When a national standard is established for end user-caused jeopardies, BellSouth will, of course, modify its current process as necessary. However, given that only a single reason code is involved, the potential rework is not expected to be extensive.

BellSouth currently notifies CLECs of service jeopardies primarily by telephone, and less frequently, by facsimile. These methods do not have an adverse impact on a CLEC's opportunity to compete, because service jeopardies are unlikely to occur on most CLEC orders. These arrangements provide CLECs with notification in substantially the same time and manner as BellSouth's retail operation. Service jeopardies occur on orders involving either new facilities or premises visits by installation technicians, neither of which is involved or required where a customer is switching existing telephone service to a CLEC. The frequency of service jeopardies on CLEC service orders therefore is expected to be relatively low.

Unlike end user-caused jeopardies, which involve a single reason code, there are many potential reason codes for service jeopardies. The number of potential codes involved magnifies the complexity of the programming effort. This is true for the CLECs as well as for BellSouth, because the potential codes would have to be implemented on both sides of the EDI interface, which would require extensive development and programming work by BellSouth and the CLECs using EDI. All CLECs using EDI with BellSouth would have to agree on the same set of non-standard codes. The complexity of the programming effort in turn magnifies the potential for costly rework

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when the industry establishes standards for the exchange of this information, which the industry has not yet done.

Given the complexities of this effort for both CLECs and BellSouth -- particularly in the absence of industry standards -- together with the fact that service jeopardies are expected to occur with relatively low frequency on CLECs' orders, BellSouth currently offers reasonable and workable arrangements for providing this information to CLECs. Furthermore, the current arrangements provide CLECs with service jeopardy notification in substantially the same time and manner as BellSouth's retail operation.

For service jeopardies, BellSouth has no single method for service jeopardy notification within BellSouth for its retail operations, nor are the methods used by BellSouth necessarily electronic. Some service jeopardies are handled by a telephone call from the work management center to the customer when it becomes apparent that an appointment will be missed for workload reasons. Information on facilities jeopardies involving residence customers is printed overnight and the printed reports are used by representatives designated to call customers when necessary.

BellSouth, nonetheless, is willing to entertain a serious inquiry into the possibility of electronic notification via EDI before standards are established, which could be accomplished after the implementation of the TCIF standard 7.0 version, which is scheduled for March 16, 1998. However, it is important to understand that establishing this process could not be a unilateral effort by BellSouth, but would require substantial work by BellSouth and by interested CLECs on their respective sides of the EDI interface, as well as agreement by interested CLECs on the codes to be programmed. If interim codes for service jeopardies were defined and implemented by BellSouth and CLECs, all parties would be forced to rewrite and recode their respective sides of the EDI interface when national standards are developed, as BellSouth is committed to implementing the standards as they become available.

**CID CHANGE REQUEST**

**October 9, 1997**

**(Revised 11/20/97)**

**CID PROJECT CONTROL NUMBER: CID-20-97**

**PAGE 13**

**Issue 2**

**8.00.05 RESELLER (TRANSFERRED) - ESTPHZ LETTER TEMPLATE**  
**TEMPLATE**

**ESTPHZ 1/19/96**

**BellSouth Telecommunications**  
**P. O. Box 100170**  
**Columbia, SC 29202-3170**

**A**

**Month 00, 1996**  
**Customer Phone Number**

**B**

**C**

**NOTICE TO:**  
**(ResellerName)**  
**(Reseller Address)**  
**ADDRESS**  
**ADDRESS**  
**ADDRESS**

**D**

**Dear Customer:**

**We have received a request to transfer local service for account number**  
**(XXX-XXX-XXXX) from your account to another service provider. While the**  
**service will be transferred as of (due date of service order), we are providing this notification as a**  
**courtesy to you.**

**E**

**PRIVATE/PROPRIETARY**

**Contains private and/or proprietary information. May not be used or disclosed outside the BellSouth Companies  
except pursuant to a written agreement.**

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**REQUEST:** When will the LENS timeout limit be set to one hour for CLECs?

**RESPONSE:** BellSouth is expediting the development of a feature to extend time-out on LENS to one hour. The exact availability date has not been determined.



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**REQUEST:** When and how will CLECs be able to do a as-is resale order as a change order instead of a disconnect/reconnect?

**RESPONSE:** That capability exists now.

## CERTIFICATE OF SERVICE

I hereby certify that on March 13, 1998, a copy of the foregoing document was served on the parties of record, via facsimile or hand delivery addressed as follows:

Dennis McNamee, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

Vincent Williams, Esquire  
Consumer Advocate Division  
426 5th Avenue, N., 2nd Floor  
Nashville, TN 37243

Dana Shaffer, Esquire  
Nextlink  
105 Malloy Street, #300  
Nashville, TN 37201

Enrico C. Soriano  
Kelley, Drye & Warren  
1200 19th St., NW, #500  
Washington, DC 20036

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave. N, # 320  
Nashville, TN 37219-1823

Carolyn Tatum Roddy, Esquire  
Sprint Communications  
3100 Cumberland Circle, N0802  
Atlanta, GA 30339

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
511 Union Street, #2400  
Nashville, TN 37219

Guilford Thornton, Esquire  
Stokes & Bartholomew  
424 Church Street  
Nashville, TN 37219

Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

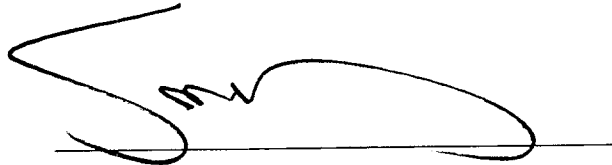
D. Billye Sanders, Esquire  
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Andrew O. Isar, Esquire  
Telecommunications Resellers Association  
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Gig Harbor, WA 98335

James P. Lamoureux  
AT&T  
1200 Peachtree St., NE, #4068  
Atlanta, GA 30367

Donald L. Scholes  
Branstetter, Kilgore, et al.  
227 Second Ave., N.  
Nashville, TN 37219

A handwritten signature in black ink, appearing to read 'Donald L. Scholes', is written over a horizontal line.